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USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 5/9/2023

May 8, 2023

**VIA ECF**

Hon. Analisa Torres  
United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl St.  
New York, NY 10007

Re: Vachnine v. Ceng Eyewear USA Inc., 23-cv-2109

Dear Judge Torres:

This firm has just been engaged to serve as counsel to Defendant C & G Eyewear USA Inc. d/b/a Cutler and Gross (sued as “Ceng Eyewear USA Inc.”) in the above-referenced action. We write to request an extension of time to: (i) respond to the Complaint on behalf of the Defendant; (ii) submit a proposed Case Management Plan and Scheduling Order (“CMP”); and (iii) submit a notice advising the Court whether the parties consent to conduct all proceedings before the assigned Magistrate Judge (the “Notice”). The current due date to respond to the Complaint was April 18, 2023 (the complaint was apparently served on the Secretary of State of New York and has yet to be delivered to Defendant) and the current date to submit the CMP and the Notice is May 15, 2023. The new proposed date to respond to the Complaint is June 22, 2023 and to submit the CMP and the Notice is June 29, 2022. This is the first request for an extension of time to adjourn any of these deadlines. Plaintiff’s counsel consents to this request. This extension is sought to provide the Defendant sufficient time to review the allegations and either prepare a response to the Complaint or explore a potential amicable resolution. No Scheduling Order has been entered in this action and this request does not affect any other date.

Thank you.

Respectfully submitted,  
*Fred H. Perkins*  
Fred H. Perkins


FHP:gg

cc: All counsel (via ECF)

GRANTED.

SO ORDERED.

Dated: May 9, 2023  
New York, New York

  
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ANALISA TORRES  
United States District Judge